

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Chester County  
Court of Common Pleas  
Brooks P. Goldsmith, Circuit Court Judge

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In the Matter of the Estate of Reba P.  
Hinson, Probate # 2008-ES-12-297,  
Circuit Court # 2010-CP-12-168,

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Mell Woods . . . . . Appellant,

v.

Robert H. Breakfield, as Personal Representative  
of the Estate of Reba P. Hinson, . . . . . Respondent.

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Reply Brief of Appellant

Court Of Appeals Internal Tracking Number: 2011-191876

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Mell Woods  
P.O. Box 2603  
Lancaster, S.C. 29721

Moses Koon & Brackett, PC  
B. Michael Brackett  
Attorney for Respondent  
Post Office Box 100261  
Columbia, S.C. 29202  
(803)-461-2300

1. In reply to respondent's initial brief, page 6, appellant will show by the record that the statement by respondent that "Appellant has apparently abandoned this case." Meaning "Case 3" number 2010-CP-12-0595, is a totally false statement communicated to the South Carolina Court of Appeals, in bad faith, and in an attempt to influence the Court's ultimate decision. Case number 2010-CP-12-0595 is an active case, and respondent was timely served with a notice of appeal on May 29, 2012.

2. Appellant is investigating as to why respondent's counsel would make such a statement, and will be filing an amended reply brief when the facts are fully developed.

Respectfully submitted,

This 09 day of July, 2012.

  
\_\_\_\_\_  
Mell Woods

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Lancaster, SC 29721

Certificate of Service follows:

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Other Counsel of Record:  
Moses Koon & Brackett, PC  
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Proof of Service

Trial Court Case Number: 2010-CP-12-0168  
Court of Appeals Internal Tracking Number: 2011-191876

I hereby certify that I have on the 09 day of July, 2012,  
served the respondents with a true copy of the  
within and foregoing *Reply Brief of Appellant*, by  
placing the copy in the U.S. Mail with sufficient postage  
addressed to:

Moses Koon & Brackett, PC  
C/O: B. Michael Brackett  
P.O. Box 100261  
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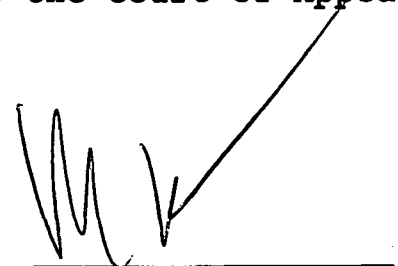
Fax Cover Sheet

Please file under Rule 262(a)(2) SCACR

- 3 pgs. follow -

Submitted  
11:35 PM  
07-09-2012

Original document will be in the mail to the Court of Appeals  
on Tuesday, July 10, 2012.



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